

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

XRAMP TECHNOLOGIES, INC. and  
XRAMP SECURITY SERVICES, INC.,

Plaintiff,

v.

GEOTRUST, INC. and  
CHRISTOPHER BAILEY,

Defendants.

Civil Action No. 05-11374-RCL

GEOTRUST, INC.,

Counterclaim-Plaintiff,

v.

XRAMP TECHNOLOGIES, INC. and  
XRAMP SECURITY SERVICES, INC.,

Counterclaim Defendants.

**GEOTRUST, INC.'S MOTION TO COMPEL THE PRODUCTION  
OF DOCUMENTS AND INTERROGATORY ANSWERS**

Pursuant to Fed. R. Civ. P. 37(a)(2), defendant and counterclaim-plaintiff GeoTrust, Inc. (“GeoTrust”) moves to compel the production of documents and information from plaintiffs and counterclaim-defendants XRamp Technologies Inc. and XRamp Security Services, Inc. (collectively, “XRamp”). In addition, GeoTrust seeks an order that XRamp provide GeoTrust a privilege log, required by Rule 26(b)(5) and Local Rule 34.1(E).

The documents and information that GeoTrust seeks can be summarized as follows:

1. Documents (some of which XRamp has been promising to produce for months) related to Verisign, Inc., et al v. XRamp Technologies, Inc., et al, Case No. SA-030CV-1131

(the “Verisign Litigation”), a case in which XRamp was alleged to have engaged in the *same conduct* that is the subject of GeoTrust’s counterclaim. XRamp does not claim that these documents are not discoverable. Rather it has simply failed to produce them or to even commit to a date by which the documents would be produced.

2. Documents (and an answer to interrogatory if the document does not contain sufficient information) that XRamp contends are “confidential,” related to the settlement of Verisign Litigation and XRamp’s contractual arrangement with GlobalSign, N.V.

3. Documents other than profit and loss statements that XRamp relies upon for its damages calculations.

The grounds for this motion are set forth in (a) Memorandum of Law in Support of Geotrust, Inc.’s Motion to Compel the Production of Documents and Interrogatory Answers, and (b) Affidavit of Daniel P. Tighe, both of which are filed herewith.

WHEREFORE, GeoTrust requests that this Court compel XRamp to produce the discovery requested above, and produce a privilege log. In addition, because there is no good faith basis for XRamp’s refusal to provide the information that is subject of this motion, GeoTrust seeks an order awarding its costs incurred in bringing this motion pursuant to Fed. R. Civ. P. 37(a)(4).

**Request for Hearing**

GeoTrust requests a hearing on this motion.

GEOTRUST, INC. and  
CHRISTOPHER BAILEY,

By their attorneys,

/s/ Daniel P. Tighe  
Daniel P. Tighe (BBO # 556583)  
Scott McConchie (BBO # 634127)  
Griesinger, Tighe & Maffei, LLP  
176 Federal Street  
Boston, MA 02110  
(617) 542-9900

Dated: March 17, 2006

**Certificate under Local Rule 7.1 and 37.1**

In accordance with Local Rule 7.1(a)(2), Daniel P. Tighe, counsel for GeoTrust, certifies that on many occasions, most recently March 10, 2006, he conferred with counsel for XRamp, John W. Brister, about this motion and attempted in good faith to resolve the matter, but was unable to reach agreement.

/s/ Daniel P. Tighe

Daniel P. Tighe

**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on March 17, 2006.

/s/ Daniel P. Tighe  
Daniel P. Tighe